

ENDANGERED SPECIES RECOVERY COUNCIL

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A NON-PROFIT CORPORATION

5 September 2000

Supl. F
Admin. A
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Training
Marine Sci.
NBS - Terr. f
NBS - Mar.

Mr. Tim Setnicka, Superintendent
Channel Islands National Park
1901 Spinnaker Drive
Ventura, California 93001

Re: Draft Environmental Impact Statement, Anacapa Island Restoration Project

Dear Mr. Setnicka,

Thank you for the opportunity to comment on this important conservation undertaking. At the outset, I would like to note that our organization, the Endangered Species Recovery Council (ESRC), is 100% in favor of the complete removal of rats from Anacapa Island and the prevention of rat introduction to any other of the CINP islands.

We have long been aware of this plan, and we believe that aerial dispersal of rodenticide is the only practical means to accomplish rat eradication. Indeed, it was the ESRC that initially provided input from New Zealand experts who have successfully removed rats and many other non-native predators at many locations around the world.

Without going into line-by-line commentary on the DEIS, we would like to submit the following summary comments that we believe are most critical to evaluation of the proposed project and its impacts:

- B1** {
- 1) It is our understanding that the precise rodenticide to be used has yet to be determined - neither the toxicant, the concentration, or the bait matrix. Until these issues have been resolved (and approved by the EPA), we find it impossible to adequately respond to the options as set forth in the DEIS.
 - 2) We are gravely concerned that there has not been sufficient public outreach and education on the issue of aerial application of rodenticide. We anticipate, in light of the minimal public awareness of the health "risks" of such operations, that there could well be a backlash that could

B1: Chapter Two (Alternatives Considered in Detail pgs 16) of the EIS describes six alternative that are being considered for implementation. Each alternative describes the toxicant and concentration, including the delivery mechanism. The inerts of the bait will be of a commercially manufactured product, optimized for maximum palatability and acceptance to rats.

B2: Chapter Five (Public Involvement pgs 84) describes the effort the Park has made to solicit public input on this project. Local newspapers (Ventura Co. Star, LA Times, and Santa Barbara Newspress) have published at least one feature article about the project, some have done two articles. The Park will continue to keep the public informed via press releases, website, and public notices on this project as the compliance process moves forward.

The environmental analysis has discussed the potential human health risk and has determined that exposure of visitors to the rodenticide is extremely low. This fact, along with the island closure and the information dissemination (as described on pg 78) reduces even further the human health risk.

B3: The interaction between Deer Mice and Xantus' Murrelets has been described elsewhere (see Murray et al. 1983, Sydeman et al. 1998). The Xantus' Murrelet has evolved and contended with native predators such as mice on Santa Barbara Island (south of Anacapa Island) for centuries and is the largest breeding colony in the USA. The Deer Mice prey only on eggs, while rats are capable of preying on eggs, chicks and adult murrelets severely impairing reproductive potential in the short term and long term. Anacapa and Santa Barbara Island share similar habitats and the Deer Mice are the only native mammals on the islands. Rats are only found on Anacapa Island, which does not have a significant murrelet breeding colony.

(Continued on next page)

LETTER B: ENDANGERED SPECIES RECOVERY COUNCIL CONT.

Mr. Tim Setnicka, Page two
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B2 {derail this important project and hinder a number of other similar efforts being planned at National Parks and other locations throughout the United States. Much, much more information needs to be proactively disseminated and public fears adequately addressed before the DEIS can be considered complete, and a reasonable assurance of public acceptance attained.

B3 {3) It should be noted in the DEIS that native Deer Mice (*Peromyscus sp.*) are also significant predators on the eggs of Xantus' Murrelet, and that removal of rats will not ensure a reduction of losses of murrelets to mice. A "decline" in numbers of murrelets and perhaps even storm-petrels cannot be exclusively attributed to rats. Conversely, a "recovery" could be limited by the presence of native deer mice. ~~Data could in fact, also be suggesting deer mouse populations.~~ This dynamic needs to be discussed in detail.

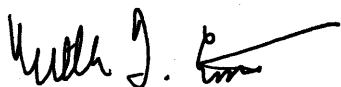
B4 {4) We believe that before rat eradication is attempted, that rodent exclusion standards and practices should be fully developed and implemented by the Park. This is not clearly stated in the DEIS.

B5 {In summary, we applaud the Park's use of electronic media to distribute the DEIS, but note that both the web site and CD ROM are cumbersome to use. In terms of substance, the document is difficult to read and understand even for professionals who have been engaged in eradication efforts for years. We suspect the public will be highly wary of technical language. Although we understand that such information needs to be included, it should also be stated in terms that a layman can easily understand.

B6 {Given the critical weaknesses in crucial elements of this otherwise comprehensive document, we feel that a Revised DEIS should be prepared, and that adequate time be allowed for other regulatory agencies to provide approvals and the public's inevitable concerns to be satisfactorily addressed.

Thank you again for the opportunity to provide comments, and we wish you well in ultimately being successful of ridding Anacapa Island of the rats that have no rightful place in this unique ecosystem.

Sincerely,



William T. Everett
President



Dick Veitch
Senior Restoration Analyst

B3 Continued:

The abundance of available nesting habitat (McChesney et al. 2000), similarity to Santa Barbara Island, and presence of the Xantus' Murrelet attempting to utilize Anacapa Island for nesting, strongly suggests that the Xantus' Murrelet and other small, crevice nesting seabirds will benefit from the removal of rats. The removal of rats from Anacapa Island should aid in the recovery of the Xantus' Murrelet and other crevice nesting species susceptible to rat predation.

B4: See Comment A14.

B5: The Park's intent in distributing the DEIS through its website was to allow for wider distribution to the public. Distribution of the DEIS by CD-ROM is a less expensive way to disseminate the analysis. However, the Park distributed traditional "hard" copies to people who requested them, or to people who did not have computer access. The Final EIS will be distributed in the same manner, however, the Park will review its website dissemination procedure.

The Park attempted to make the document as readable and understandable as possible. Some of the technical language that is in the document is a product of the complex subject matter. Since most of the environmental impacts revolve around rodenticide toxicology, standard methods were used for displaying and discussing this subject. Where possible the analysis attempted to summarize this information.

B6: The environmental analysis that has been prepared for this project meets a very high standard of environmental analysis. Both the legal requirement and the spirit of NEPA have been fulfilled. A supplemental EIS is necessary when substantial new information is discovered or substantial changes with environmental ramifications are made to the proposed action or an alternative to the proposed action. Because substantial changes are not being made, a supplemental EIS is not necessary. The Final EIS adds an option for preparing a supplemental EIS should first year implementation monitoring results indicate that objectives are not being met, or environmental effects are different that what is described in the FEIS (see pg 16 "Effectiveness and Validation Monitoring").